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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
RILEY THOMAS,  
  
Defendant.

**Case No.: 25-CR-95 PCP (SVK)**  
**STIPULATION TO CONTINUE**  
**FURTHER BAIL REVIEW HEARING;**  
**~~PROPOSED~~ ORDER**

Defendant Riley Thomas, represented by AFD Dejan M. Gantar, and the Government, represented by AUSA Jeffrey Backhus, respectfully request that the bail review hearing currently scheduled for September 3, 2025, be continued until September 11, 2025.

On August 29, 2025, the parties appeared on the magistrate court duty calendar before the Honorable Nathanael Cousins, to address Pretrial Services' violation memorandum filed at ECF 23. At that hearing, the Court granted the defense's request for discovery from Pretrial Services and continued the matter for a status hearing until September 3, 2025. The parties received the discovery from Pretrial Services today. Additionally, the defense requires additional time to conduct investigation regarding

1 the underlying alleged violation. Accordingly, the parties make the instant request.

2 The parties have conferred with Pretrial Services, who does not oppose this request.

3 IT IS SO STIPULATED.

4  
5 JODI H. LINKER  
6 Federal Public Defender  
Northern District of California

7 DATED: September 2, 2025

8 */s/ Dejan M. Gantar*  
9 DEJAN M. GANTAR  
Assistant Federal Public Defender

10 */s/ Jeffrey Backhus*  
11 JEFFREY BACKHUS  
Assistant United States Attorney

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13 \*The filing attorney certifies that he has received written authorization to file this Stipulation and  
14 ~~[Proposed]~~ Order on behalf of the non-filing attorney.

~~[PROPOSED]~~ ORDER

Pursuant to the parties' stipulation, and for good cause shown, the Court HEREBY ORDERS that the bail review hearing currently scheduled for September 3, 2025 is continued until September 11, 2025.

**IT IS SO ORDERED.**

DATED: 9/3/2025

  
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THE HONORABLE SUSAN VAN KEULEN  
UNITED STATES MAGISTRATE JUDGE